

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION**

ANN T. CORBETT, individually and)
as the Personal Representative of the)
Estate of Patrick Corbett, deceased,)

Plaintiff,)

vs.)

LONGWOOD PLANTATION-FHE,)
LLC., doing business as Longwood)
Plantation and Magnolia Place;)

LONGWOOD PLANTATION HOME)
CARE-FHE, LLC., doing business as)

Longwood Plantation and Magnolia Place;)
and **J. CLAY FOWLER**, individually and)

as an owner and member of Longwood)
Plantation-FHE, LLC and as an owner and)

member of Longwood Plantation Home)
Care-FHE, LLC.; and **PAULA FOWLER**,)

individually and as an owner and member)
of Longwood Plantation-FHE, LLC and as)

an owner and Member of Longwood)
Plantation Home Care-FHE, LLC.,)

Defendants.)

Case No.: 5:2023cv00635

MOTION FOR EXTENSION OF TIME

NOW COMES PLAINTIFF, by and through the undersigned counsel, moving the Court for an extension of time to file a response to Defendants' Motion to Dismiss.

The grounds for this Motion are as follows:

1. This matter was filed in the Court of Common Pleas, County of Orangeburg on November 22, 2022.
2. Defendants removed the matter to this Court on February 14, 2023.

3. On February 21, 2023, Defendants filed a Motion to Dismiss.
4. On May 25, 2023, the Court denied the Defendant's Motion to Dismiss, and remanded the matter to the state Court.
5. On June 9, 2023, the Defendant filed a Motion for Stay. It appears that the Defendants' time to appeal has already expired. However, Plaintiff desires to investigate this matter further. Plaintiff's response is due today, June 26, 2023.
6. Spectrum has experienced extreme outage in the Orangeburg County area over the last several days. Plaintiff's counsel internet has been intermittently inoperable for several days. Counsel respectfully requests until and including June 30, 2023 in order to file a response, if any, to the Defendants' Motion for Stay.
7. Due to technical internet issues, the decision to request an extension out of the abundance of caution was made at the last minute and counsel has not contacted the Defendant's counsel due to the time element.
8. Plaintiff's counsel requests an extension of four days in order to respond to the Defendant's Motion for Stay.

WHEREFORE, for good cause shown, Plaintiff requests to and including June 30, 2023, in order to file a Response to Defendants' Motion for Stay.

At Orangeburg, SC

Dated: June 26 , 2023

/s/ Glenn Walters, Sr.
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Attorney for Plaintiff